

ALLEN WINDRIM, Pro Se	:	UNITED STATES BANKRUPTCY COURT
Debtor	:	EASTERN DISTRICT OF PENNSYLVANIA
	:	
	:	
	:	Bankruptcy No. 18-16016JKF
	:	Chapter 13
	:	

DEBTORS OBJECTIONS TO TRUSTEE'S MOTION TO DISMISS

AND NOW, comes Debtor, Allen Windrim, and files the within Answer's and allege as follows:

1. Debtor, is ProSe and is currently amending the previously submitted plan and respectfully requests a stay of all proceedings and requests time to amend the plan and file the same with the Honorable court.
2. Debtor, has concerns that the trustee had prepared and filed the Amended Motion To Dismiss prior to the scheduled, January 18th, 2019 first meeting of the creditors, not allowing Debtor an opportunity to discuss and understand any open concerns with the filed plan.
3. Debtor, had a successful meeting with attorney Polly Langdon, on the 18th January 2019, during the meeting of the creditors and was provided with a detailed list of deficiencies' with the filed plan and informed Ms. Langdon that an amended plan will be filed.
4. Debtor, has also meet with two additional, in addition to the three attorney's already met, to discuss legal representation; unfortunately, neither attorney will accept the case with payment, in full, up front. Debtor, is unable to afford the attorney's fees, at this present time, and is working on acquiring the funds to retain and attorney.
5. Debtor, is aware of the mistakes made in the filed plan and is currently amending the plan and anticipates to correct all noted deficiencies and the plan will also anticipate to satisfy all creditors.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Debtors Objections To Trustee's Motion To Dismiss, were served on this 28th day of January, 2019, by first class mail upon those listed below:

U.S. Bankruptcy Court
Clerk's Office
United States Courthouse
900 Market Street
Philadelphia, PA 19107
&
Polly Langdon, Esq.
for William Miller, Esq.
Interim Chapter 13 Trustee
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606

/s/: Allen Windrim
Allen Windrim, Pro Se,
Debtor

Dated: 28th January 2019